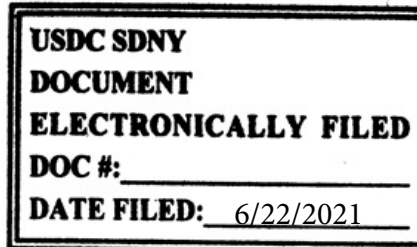


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June 21, 2021

VIA ECF

Hon. Katharine H. Parker
United States Magistrate Judge, Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Room 750
New York, New York 10007

APPLICATION GRANTED

Katharine H. Parker
Hon. Katharine H. Parker, U.S.M.J.
6/22/2021

Re: *Spectrum Dynamics Medical Limited v. GE*; Case No.: 18-cv-11386 (VSB)

Dear Magistrate Judge Parker:

We represent Plaintiff Spectrum Dynamics Medical Limited (“Plaintiff” or “Spectrum”) in the above-referenced action. On behalf of Plaintiff, we write pursuant to Rule III(d) of your Honor’s Individual Practices in Civil Cases to respectfully request permission to file under seal, in accordance with Paragraph 20.b of the Stipulated Confidentiality and Protective Order [D.I. 156] (“Protective Order”), Plaintiff’s Claw-Back Challenge Letter (“Letter”) and Exhibits thereto filed today, June 21, 2021.

Plaintiff requests leave to file the Letter and Exhibits under seal because they contain, discuss and reflect information that Defendants have either designated as “Highly Confidential – Attorneys’ Eyes Only” and/or information Defendants’ have sought to claw-back under Paragraph 20.b of the Protective Order.

Respectfully submitted,

/Neil F. Greenblum/

Neil F. Greenblum

cc: All counsel of record (via ECF)